



# Hoffman Employment Law, LLC

600 Jefferson Plaza Suite 204  
Rockville, MD 20852  
Phone: 301-251-3752 | Fax: 301-251-3753

## Account Statement

Prepared for Justin Edward VanPelt  
Re: Unpaid Wage Claim Giuseppe's Italian Restaurant

|                  |             |
|------------------|-------------|
| Previous Balance | \$0.00      |
| Current Charges  | \$12,382.50 |
| New Balance      | \$12,382.50 |
| Adjustments      | \$0.00      |
| Payments         | \$0.00      |
| Now Due          | \$12,382.50 |
| Trust Account    | \$0.00      |

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## PRE-BILL

Justin Edward VanPelt

Invoice Date: July 08, 2019  
 Invoice Number: Pre-bill  
 Invoice Amount: \$12,382.50

### Matter: Unpaid Wage Claim Giuseppe's Italian Restaurant

#### Attorney's Fees

|           |   |        |      |          |
|-----------|---|--------|------|----------|
| 2/11/2019 | Interview potential client regarding payment of final check and overtime wages while employed at Giuseppe's (.4);<br>Draft letter of representation for potential clients (.4);<br>Draft email to potential client regarding letter of rep and second interview (.1). | G.H.   | .90  | \$184.50 |
| 2/15/2019 | Draft comm to G. Herbers re status of matter.   | H.B.H. | .10  | \$40.00  |
| 2/21/2019 | Call with potential client regarding overtime claim against Giuseppe's (.4);<br>Draft email to client regarding letter of representation (.1)   | G.H.   | .50  | \$102.50 |
| 2/21/2019 | Call with second potential client regarding overtime claims against Giuseppe's (.4);<br>Draft second email to potential client regarding letter of representation (.1).   | G.H.   | .50  | \$102.50 |
| 2/22/2019 | Call with client R. Keller regarding overtime claims and wage/hour documents (.2);<br>Review documents provided by client R. Keller (1.4).  | G.H.   | 1.60 | \$328.00 |
| 2/22/2019 | Review schedules and paystubs of R. Keller.   | H.B.H. | .30  | \$120.00 |
| 2/25/2019 | Review case file, draft complaint.  | G.H.   | 3.70 | \$758.50 |
| 2/26/2019 | Review case file, draft complaint.  | G.H.   | 1.10 | \$225.50 |
| 2/27/2019 | Review case file, draft complaint.  | G.H.   | 1.10 | \$225.50 |
| 2/28/2019 | Call with client J. Van Pelt regarding case update and experiences at Giuseppe's (.4);<br>Review and revise complaint (1.4).  | G.H.   | 1.80 | \$369.00 |

|           |   |        |      |          |
|-----------|---|--------|------|----------|
| 3/1/2019  | Call with client R. Keller regarding employment experience at Giuseppe's.   | G.H.   | .50  | \$102.50 |
| 3/4/2019  | Review and revise complaint.  | G.H.   | .80  | \$164.00 |
| 3/5/2019  | Review and revise complaint (.5);<br>Correspond with clients regarding teleconf. to discuss complaint and future steps (.2).  | G.H.   | .70  | \$143.50 |
| 3/6/2019  | Tele conf with JV and G. Herbers re status of matter. (.2 hrs); tele conf. with RK and G. Herbers re status of matter and potential issues re defenses (.4 hrs); tele conf. with with JT and G. Herbers re status of matter. (.2 hrs). Review and revise Complaint. Review proposed summons and civil cover sheet. (.2 hrs). Open case via ECF. (.1 hrs).                   | H.B.H. | 1.10 | \$440.00 |
| 3/6/2019  | Call with client J. Van Pelt regarding case status and future steps (.2);<br>Call with client R. Keller regarding case status and future steps (.4);<br>Call with client J. Taylor regarding case status and future steps (.2);<br>Conf. with HBH regarding complaint revisions and assignments (.1);<br>Revise complaint (.2);<br>Draft civil coversheet and summons (.3). | G.H.   | 1.40 | \$287.00 |
| 3/7/2019  | File Pl. Consent to Magistrate Judge.   | J.L.   | .10  | \$20.50  |
| 3/7/2019  | Draft email to client regarding case status and future steps (.2);<br>Draft Plaintiffs' consent to Magistrate Judge (.1).   | G.H.   | .30  | \$61.50  |
| 3/7/2019  | Communicate with process server re assignment.  | H.B.H. | .10  | \$40.00  |
| 3/7/2019  | Review Order re consent to Magistrate; comm. with assoc. atty re preparation of same.   | H.B.H. | .10  | \$40.00  |
| 3/7/2019  | Review summons issued and notice of case assignment.  | H.B.H. | .10  | \$40.00  |
| 3/11/2019 | Confer with G. Herbers re potential new additional plaintiff and strategies re amendment. Discuss service of process.   | H.B.H. | .20  | \$80.00  |
| 3/11/2019 | Draft memo to service processor regarding service of lawsuit on defendants (.3);<br>Prepare documents for service on defendants, prepare postage and mailing to process server (.3).  | G.H.   | .60  | \$123.00 |
| 3/11/2019 | Call with potential client regarding employment experience at Giuseppe's, overtime lawsuit, and procedure to join case (.4);<br>Draft email to potential client regarding letter of representation (.1).  | G.H.   | .50  | \$102.50 |
| 3/11/2019 | Draft comm to K. Taylor re status of matter.  | H.B.H. | .10  | \$40.00  |
| 3/18/2019 | Research proper address for service of lawsuit on Defendants.   | G.H.   | .20  | \$41.00  |
| 4/1/2019  | Review filing of entry of appearance by opposing counsel.   | H.B.H. | .10  | \$40.00  |
| 4/2/2019  | Review Order of Court and filing re Consent to Magistrate.  | H.B.H. | .10  | \$40.00  |

|           |  |        |      |           |
|-----------|--|--------|------|-----------|
| 4/3/2019  | Review case file, prepare proofs of service for Giuseppe's Inc. and M. Witt for filing.  | G.H.   | .10  | \$20.50   |
| 4/3/2019  | Draft comm to opposing counsel re service issue. Review response.  | H.B.H. | .20  | \$80.00   |
| 4/3/2019  | Review filing of proof of service.   | H.B.H. | .10  | \$40.00   |
| 4/8/2019  | Review email from opposing counsel re. acceptance of service.  | J.L.   | .10  | \$20.50   |
| 4/8/2019  | Review response from opposing counsel re service of complaint.   | H.B.H. | .10  | \$40.00   |
| 4/9/2019  | Review email from opposing counsel re. acceptance of service for Def. Witt.  | J.L.   | .10  | \$20.50   |
| 4/9/2019  | Review and respond to opposing counsel's email re service. (.1 hrs). Review Answer and compare to Complaint allegations. (.3 hrs). | H.B.H. | .40  | No Charge |
| 4/10/2019 | Review order for conference call re. scheduling order and informal discovery dispute memo from Court.                              | J.L.   | .20  | \$41.00   |
| 4/11/2019 | Review Defendants' Answer, the Court's proposed schedule, proposed scheduling order, and discovery dispute procedures.             | G.H.   | .40  | \$82.00   |
| 4/18/2019 | Review answer with HBH and SEK and discuss motion to strike.   | J.L.   | .20  | \$41.00   |
| 4/18/2019 | Review Answer, Discuss Motion to Strike  | S.K.   | .20  | \$41.00   |
| 4/18/2019 | Confer with SK and JL re moving to strike deficient answer.  | H.B.H. | .20  | \$80.00   |
| 4/22/2019 | Drafting Motion to Deem Admitted   | S.K.   | 1.80 | \$369.00  |
| 4/23/2019 | Mtg. with Jordan and Howard re: Joint-Stipulation  | S.K.   | .20  | \$41.00   |
| 4/23/2019 | Call w/ opposing counsel re: schedule and joint-stip   | S.K.   | .10  | \$20.50   |
| 4/23/2019 | Confer w/ HBH and SEK re. case schedule and joint stipulation and case strategy.   | J.L.   | .20  | \$41.00   |
| 4/23/2019 | Phone confer w/ HBH, SEK, and opposing counsel re. case schedule in prep for phone call w/ judge.                                  | J.L.   | .10  | \$20.50   |
| 4/23/2019 | Draft joint stipulation of enterprise coverage.  | J.L.   | .30  | \$61.50   |
| 4/23/2019 | Tele conf with opposing counsel and associates re scheduling and status of matter.   | H.B.H. | .10  | \$40.00   |
| 4/24/2019 | Phone confer w/ Judge and opposing counsel re. prop. schedule.   | J.L.   | .20  | \$41.00   |
| 4/24/2019 | Conference w/ HBH and SEK on case status and assignment of duties.   | J.L.   | .10  | \$20.50   |
| 4/24/2019 | Review Case Status   | S.K.   | .10  | \$20.50   |
| 4/24/2019 | Review Scheduling Order entered.   | H.B.H. | .10  | \$40.00   |
| 4/30/2019 | Review joint stipulation re. enterprise coverage w/ HBH, draft and send email to opposing counsel re. same.                        | J.L.   | .10  | \$20.50   |
| 5/6/2019  | Prepare interrogatories for mailing, draft email to opposing counsel re. interrogatories.  | J.L.   | .20  | \$41.00   |
| 5/6/2019  | Draft interrogatories and request for production of documents; review and revise same.   | H.B.H. | 2.40 | \$960.00  |
| 5/10/2019 | File Joint Stipulation re Enterprise Coverage.   | H.B.H. | .10  | No Charge |
| 5/17/2019 | Review communications re: Amended Complaint  | S.K.   | .10  | \$20.50   |
| 5/17/2019 | Review and respond to comm from client (JV) re   | H.B.H. | .20  | \$80.00   |

|           |  |        |      |          |
|-----------|--|--------|------|----------|
|           | status of matter. (.1 hrs). Review and respond to comm from opposing counsel. (.1 hrs).  |        |      |          |
| 5/21/2019 | Review scheduling order, update calendar.  | J.L.   | .20  | \$41.00  |
| 5/21/2019 | Review pleadings file and complaint.   | J.L.   | .20  | \$41.00  |
| 5/22/2019 | Phone call w/ Pl. K. Taylor re. employment details.  | J.L.   | .30  | \$61.50  |
| 5/22/2019 | Draft amended complaint.   | J.L.   | 1.30 | \$266.50 |
| 5/23/2019 | Draft and edit amended complaint.  | J.L.   | 1.50 | \$307.50 |
| 5/28/2019 | Edit amended complaint.  | J.L.   | .10  | \$20.50  |
| 5/28/2019 | Draft motion for leave to file 1st amended complaint and proposed order.   | J.L.   | .40  | \$82.00  |
| 5/28/2019 | Prepare and file motion for leave to file first amended complaint, accompany attachments and proposed order.   | J.L.   | .30  | \$61.50  |
| 5/28/2019 | Review Amended Complaint   | S.K.   | .30  | \$61.50  |
| 5/28/2019 | Confer with J. Liew re preparing Motion for Leave to File First Amended Complaint. (.2 hrs). Review and revise First Amended Complaint; prepare redline and forward to opposing counsel. (.5 hrs). | H.B.H. | .70  | \$280.00 |
| 5/29/2019 | Entering Notice of Appearance  | S.K.   | .20  | \$41.00  |
| 5/29/2019 | Review Order re granting leave re First Amended Complaint.   | H.B.H. | .10  | \$40.00  |
| 5/29/2019 | Review Order re First Amended Complaint; review Court filing of First Amended Complaint.   | H.B.H. | .10  | \$40.00  |
| 5/30/2019 | Draft comm to expert witness re status of matter.  | H.B.H. | .10  | \$40.00  |
| 6/3/2019  | Review emails between HBH and opposing counsel re. discovery production.   | J.L.   | .10  | \$20.50  |
| 6/3/2019  | Drafting Lodestar Statement  | S.K.   | .40  | \$82.00  |
| 6/3/2019  | Drafting RPDs  | S.K.   | 2.20 | \$451.00 |
| 6/3/2019  | Review comms. with counsel re: discovery production  | S.K.   | .20  | \$41.00  |
| 6/3/2019  | Comm with opposing counsel re discovery.   | H.B.H. | .10  | \$40.00  |
| 6/3/2019  | Review billing records. Draft comm to assoc atty re lodestar. Review lodestar; comm. with assoc atty re same.  | H.B.H. | .20  | \$80.00  |
| 6/6/2019  | Review Settlement Offer  | S.K.   | .30  | \$61.50  |
| 6/6/2019  | Confer w/ HBH re: settlement offer   | S.K.   | .10  | \$20.50  |
| 6/7/2019  | Review email from SEK to Pls. re. damage calculations  | J.L.   | .10  | \$20.50  |
| 6/7/2019  | Review email from opposing counsel re. wage documents.   | J.L.   | .10  | \$20.50  |
| 6/7/2019  | Confer with S. Kraff re wage/hour records and offers of judgment. Review comm from S. Kraff to clients; comm re same.  | H.B.H. | .30  | \$120.00 |
| 6/7/2019  | Review production of documents by Defendants   | S.K.   | 1.70 | \$348.50 |
| 6/7/2019  | Drafting email to clients re: offer of judgment  | S.K.   | .30  | \$61.50  |
| 6/10/2019 | Call w/ Van Pelt re: Offer of Judgment   | S.K.   | .20  | \$41.00  |
| 6/10/2019 | Call w/ Keller re: Offer of Judgment   | S.K.   | .20  | \$41.00  |
| 6/10/2019 | Review email communications between HBH and opposing counsel re. discovery deadlines and settlement possibility.   | J.L.   | .10  | \$20.50  |
| 6/14/2019 | Review email from opposing counsel re. settlement  | J.L.   | .10  | \$20.50  |

|           |  |        |       |             |
|-----------|--|--------|-------|-------------|
|           | offer.   |        |       |             |
| 6/14/2019 | Review comm from opposing counsel re settlement issues.  | H.B.H. | .10   | \$40.00     |
| 6/18/2019 | Review email from opposing counsel re. acceptance of attorneys' fees and moving forward on settlement.   | J.L.   | .10   | \$20.50     |
| 6/19/2019 | Drafting Settlement Agreement  | S.K.   | 2.10  | \$430.50    |
| 6/19/2019 | Drafting Motion to Approve Settlement  | S.K.   | 2.80  | \$574.00    |
| 6/21/2019 | Review and revise settlement agreement. Review and revise Motion for Settlement. Review proposed Order. Draft comm to opposing counsel attaching same. | H.B.H. | .60   | \$240.00    |
| 6/26/2019 | Review email from SEK to opposing counsel re. set agreement.   | J.L.   | .10   | \$20.50     |
| 6/26/2019 | Draft email to counsel re: settlement agreement  | S.K.   | .10   | \$20.50     |
| 6/27/2019 | Review comm from opposing counsel; review proposed edits to agreement. Confer with Associate Atty (SK) re same.  | H.B.H. | .20   | \$80.00     |
| 6/27/2019 | Review edits to Settlement Agreement   | S.K.   | .80   | \$164.00    |
| 6/28/2019 | Review edits to settlement agreement; multi comm with opposing counsel re status of matter.  | H.B.H. | .30   | \$120.00    |
| 7/1/2019  | Review Comms re: Settlement Agreement  | S.K.   | .20   | \$41.00     |
| 7/1/2019  | Review comm from opposing counsel attaching signed agreement.  | H.B.H. | .10   | \$40.00     |
| 7/2/2019  | Assisting w/ DocuSign signing of set. agreement.   | J.L.   | .10   | \$20.50     |
| 7/2/2019  | Draft extensive comm to clients re status of matter, including settlement.   | H.B.H. | .40   | \$160.00    |
| 7/2/2019  | Prepare DocuSign of Settlement Agreement   | S.K.   | .40   | \$82.00     |
| 7/3/2019  | Confer w/ HBH and SEK re. case status.   | J.L.   | .10   | \$20.50     |
| 7/3/2019  | Confer with associate attorneys re status of matter.   | H.B.H. | .10   | \$40.00     |
| 7/3/2019  | Confer w/ HBH and JSL re: case status and priorities   | S.K.   | .10   | \$20.50     |
| 7/5/2019  | Phone call w/ Pl. Keller re. DocuSigning settlement agreement.   | J.L.   | .10   | \$20.50     |
| 7/5/2019  | Prepare DocuSign of Settlement Agreement (new link)  | S.K.   | .20   | \$41.00     |
| 7/7/2019  | Assemble settlement agreement; forward same to opposing counsel with comm re Motion for Settlement Approval.   | H.B.H. | .30   | \$120.00    |
| 7/8/2019  | Prepare Declaration of Hours   | S.K.   | .20   | \$41.00     |
| 7/8/2019  | Draft declaration for settlement agreement.  | J.L.   | .10   | \$20.50     |
| SUBTOTAL: |  |        | 49.40 | \$11,857.50 |

**Costs**

|           |                                      |  |  |          |
|-----------|--------------------------------------|--|--|----------|
| 3/6/2019  | Filing Fee                           |  |  | \$400.00 |
| 4/4/2019  | Service of Process - Dawn Orem-Dolly |  |  | \$125.00 |
| SUBTOTAL: |                                      |  |  | \$525.00 |

**Matter Ledgers**

SUBTOTAL:

**Trust Account**

|                     |                  |        |
|---------------------|------------------|--------|
| 7/8/2019            | Previous Balance | \$0.00 |
| Available in Trust: |                  | \$0.00 |

TOTAL \$12,382.50

PREVIOUS BALANCE DUE \$0.00

CURRENT BALANCE DUE AND OWING \$12,382.50